

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA**

WINFRED MUCHIRA,

Plaintiff,

vs.

HALAH AL-RAWAF,  
IBRAHIM AL-RASHOUDI,  
FAHAD AL-RASHOUDI,  
LULUH AL-RASHOUDI,  
10686 Waterfalls Lane  
Vienna, VA 22182  
Fairfax County

Defendants.

Civil Action No. 1:14-cv-00770-AJT-JFA

**JURY TRIAL DEMANDED**

**STIPULATION OF UNDISPUTED FACTS**

Plaintiff Winfred Muchira and Defendants, Halah Alrawaf, Ibraheem Alrashoudi, Fahad Alrashoudi, and Luluh Alrashoudi, by counsel, respectfully submit this Stipulation of Undisputed Facts pursuant to the Court's August 18, 2014 order (D.I. 18).

1. Halah Alrawaf was a lessor of the house at 10686 Waterfalls Lane, Vienna, VA 22182.
2. Halah Alrawaf was a lessor of one or more apartments at 4417 Dixie Hill Road, Fairfax, VA 22030.
3. The rental payments for the 10686 Waterfalls Lane house came from Halah Alrawaf's account.
4. Halah Alrawaf paid monthly rent for the 10686 Waterfalls Lane house.
5. Each of the defendants spent time with Ms. Muchira in the same house in Virginia in which Ms. Muchira worked for defendants.

6. Halah Alrawaf, Ibraheem Alrashoudi, Fahad Alrashoudi, and Luluh Alrashoudi were aware of the conditions in Virginia in which Ms. Muchira worked prior to March 29, 2013.
7. Halah Alrawaf lived at 10686 Waterfalls Lane, Vienna, VA 22182 from October 2012 until June 18, 2014.
8. Ibraheem Alrashoudi stayed at 10686 Waterfalls Lane, Vienna, VA 22182 from February 3 to February 7, 2013.
9. Fahad Alrashoudi lived at 10686 Waterfalls Lane, Vienna, VA 22182 from October 2012 until June 28, 2014.
10. Luluh Alrashoudi lived at 10686 Waterfalls Lane, Vienna, VA 22182 from October 2012 until June 28, 2014.
11. Ibraheem Alrashoudi contacted David Murithi and asked him for assistance in finding a suitable person to be a house maid for his family in Saudi Arabia, and David Murithi found Winfred Muchira, who the family hired for this purpose.
12. Ibraheem Alrashoudi participated in arranging for the authorization for a visa for Ms. Muchira to travel from Kenya to Saudi Arabia to work for his family.
13. Ibraheem Alrashoudi participated in arranging for a visa for Ms. Muchira to travel from Kenya to Saudi Arabia to work for his family.
14. Ms. Muchira arrived at the Alrawaf home in Riyadh, Saudi Arabia, in December 2010 and worked for Alrawaf in Saudi Arabia for approximately 17 months as a live-in house maid.
15. Before Ms. Muchira came to the United States, members of the Saudi Family discussed Ms. Muchira's anticipated working conditions in the United States with Ms. Muchira.

16. Members of the Saudi Family assured Ms. Muchira that she could attend church in the United States if she came to work for Alrawaf in the United States.

17. In June or July 2012, members of the Saudi Family scheduled an appointment for Ms. Muchira at the Embassy of the United States in Riyadh, Saudi Arabia, as part of the process by which Ms. Muchira could obtain a B1 visa to accompany Alrawaf to the United States and work as a house maid.

18. Prior to Ms. Muchira's appointment at the U.S. Embassy in Riyadh, members of the Saudi Family explained to Ms. Muchira the purpose of the appointment.

19. In June or July 2012, members of the Saudi Family accompanied Ms. Muchira to her appointment at the U.S. Embassy in Riyadh.

20. Members of the Saudi Family told U.S. Embassy officials that Ms. Muchira would be compensated in accordance with the terms of her employment contract and that her employment would be consistent with U.S. laws.

21. The United States issued a B1 visa to Ms. Muchira to accompany Halah Alrawaf to the United States for six months.

22. Ms. Muchira left the Waterfalls Lane house on March 29, 2013 without her passport.

23. Winfred Muchira was employed as a housemaid in the household of Halah Alrawaf, Fahad Alrashoudi, and Luluh Alrashoudi from July 28, 2012, to March 29, 2013.

24. Ms. Muchira did not have her own car.

25. Halah Alrawaf, Luluh Alrashoudi, and Fahad Alrashoudi were aware that Ms. Muchira had a Facebook account during the timeframe that Ms. Muchira worked for the family in Virginia.

26. Halah Alrawaf did not maintain a record of hours Ms. Muchira worked.

27. Ibraheem Alrashoudi did not maintain a record of hours Ms. Muchira worked.

28. Fahad Alrashoudi did not maintain a record of hours Ms. Muchira worked.

29. Luluh Alrashoudi did not maintain a record of hours Ms. Muchira worked.

Dated: January 14, 2015

Respectfully submitted,

/s/ Deborah Anne Yates  
Deborah Anne Yates (VA Bar no. 74773)  
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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on January 14, 2015, a copy of the foregoing was filed electronically. Notice of this filing will be sent by electronic mail to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's electronic filing system.

By: /s/ Deborah Anne Yates  
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